

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Defendant.

Civil Action No. 1:14-cv-14176-ADB

MOTION TO SEAL EXHIBITS TO OFFER OF PROOF

Pursuant to Local Rule 7.2 and the Stipulated Protective Order (Dkt. 55), Plaintiff Students for Fair Admissions, Inc. (“SFFA”) hereby moves this Court for an order sealing exhibits to SFFA’s Offer of Proof. The documents that SFFA seeks to seal are designated Confidential or Highly Confidential-Attorneys’ Eyes Only pursuant to the Stipulated Protective Order (Dkt. 55).

SFFA requests that the documents subject to this Motion be impounded until further order of the Court. In the event the Court has not previously ordered otherwise, the parties’ submissions should be returned to their undersigned counsel upon resolution of this matter.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow exhibits to SFFA’s Offer of Proof be filed under seal on or before October 29 and to be viewed only by the Judge, her clerk(s), and Court personnel.

Dated: October 27, 2018

Respectfully submitted,

/s/ Katherine L.I. Hacker

Adam K. Mortara
J. Scott McBride
Krista J. Perry
Bartlit Beck Herman Palenchar & Scott LLP
54 West Hubbard Street, Suite 300
Chicago, IL 60654
312.494.4400
adam.mortara@bartlit-beck.com
scott.mcbride@bartlit-beck.com
krista.perry@bartlit-beck.com

John M. Hughes
Katherine L.I. Hacker
Meg E. Fasulo
Bartlit Beck Herman Palenchar & Scott LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
303.592.3100
john.hughes@bartlit-beck.com
kat.hacker@bartlit-beck.com
meg.fasulo@bartlit-beck.com

William S. Consovoy
Thomas R. McCarthy
Michael H. Park
J. Michael Connolly
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
703.243.9423
will@consovoymccarthy.com
tom@consovoymccarthy.com
park@consovoymccarthy.com
mike@consovoymccarthy.com

Patrick Strawbridge BBO #678274
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
617.227.0548
patrick@consovoymccarthy.com

Paul M. Sanford BBO #566318
BURNS & LEVINSON LLP
One Citizens Plaza, Suite 1100 Providence,
RI 02903
617.345.3000
psanford@burnslev.com
bcaldwell@burnslev.com

Attorneys for Plaintiff Students for Fair Admissions, Inc.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(a), the undersigned conferred with counsel for Defendant on October 26, 2018, and Defendant consents to this motion.

/s/ Katherine L.I. Hacker

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 27th day of October, 2018.

/s/ Katherine L.I. Hacker